

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION, AKRON**

In Re:)	Chapter 13 Case No. 15-50066
)	
JOSEPH M. CAMPBELL)	Judge Alan M. Koschik
MICHELLE K. CAMPBELL)	
)	
)	MOTION TO ALLOW LATE-FILED
Debtor(s).)	CLAIM BY CONDOR CAPITAL CORP.
)	(Proof of Claim No. 5)

Debtors, Joseph M. Campbell and Michelle K. Campbell ("Debtors") hereby respectfully move this Court for an order allowing the late-filed proof of claim No. 5 ("Claim No. 5"), filed by Condor Capital Corp. ("Condor"), for the following reasons:

When the Debtors filed their petition, related schedules and proposed Chapter 13 Plan on January 13, 2015, the Debtors were under the mistaken impression that both of their secured vehicle loans had been transferred or assigned from Condor to Westlake Financial Services ("Westlake"). The Debtors schedules, proposed Chapter 13 Plan (ECF doc. #2), Adequate Protection Order (ECF doc. #22), and confirmed Chapter 13 Plan (ECF doc. #25) reflect their mistaken belief.

A little over a month after the Debtors' Chapter 13 Plan was confirmed on April 3, 2015, Condor informed the Debtors that, while the loan for Mr. Campbell's 2007 Nissan had been transferred/assigned to Westlake, the loan for Ms. Campbell's 2008 Hyundai Tucson had not been transferred/assigned to Westlake. The Debtors, in turn, notified the undersigned of the situation.

On May 18, 2015, the undersigned telephoned Condor, spoke with Patricia A. Yasparro of Condor's legal department, notified Condor of the within Chapter 13 proceeding, and requested that Condor file a proof of claim for the 2008 Hyundai as soon as possible, as the

deadline to file a non-government proof of claim was May 20, 2015. Condor filed its proof of Claim No. 5 on June 1, 2015, twelve days late.

The Debtors respectfully pray that this Court allow Condor's Claim No. 5—subject to a pending objection regarding the proper interest rate (ECF doc. #33)—and allow the Chapter 13 Trustee to begin paying \$157.00 per month, per the Claim No. 5 to Condor Capital Corp. If the late-filed Claim No. 5 is not allowed, the Debtors may have to dismiss the within Chapter 13 proceeding, file a new Chapter 13 proceeding, and start all over.

Wherefore, in the interest of judicial economy, and because no other creditor(s) will be prejudiced if the late-filed Claim No. 5 is allowed, the Debtors respectfully pray that this Court allow the late-filed proof of Claim No. 5, filed by Condor Capital Corp., subject to the pending objection regarding the proper interest rate (ECF doc. #33).

Respectfully submitted,
BROWN, AMODIO & CHANDLER, LPA

Dated: 06/15/2015

/s/ Donald Luke Ross
Donald Luke Ross (0085914)
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CERTIFICATE OF SERVICE

I hereby certify that on the 15th of June, 2015, true and correct copy/copies of the within Motion was/were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties were served by regular U.S. mail, postage prepaid. All parties may access this filing via the Court's electronic filing system. The parties and/or their attorneys were served as follows:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Stacey A O'Stafy on behalf of Creditor Ocwen Loan Servicing, LLC
bankruptcy@mdk-llc.com, anhsmdk@earthlink.net;anhsmdk@zuckergoldberg.com

Donald Luke Ross on behalf of Debtor Joseph M. Campbell
dlross@brownandamodio.com, ross.434@outlook.com;ross.donald.luke@gmail.com

Donald Luke Ross on behalf of Debtor Michelle K. Campbell
dlross@brownandamodio.com, ross.434@outlook.com;ross.donald.luke@gmail.com

Keith Rucinski, Chapter 13 Trustee
efilings@ch13akron.com, krucinski@ecf.epiqsystems.com

And by regular U.S. mail, postage prepaid, on:

<p>Synchrony Bank c/o Recovery Mgmt. Systems Corp. 25 SE 2nd Ave., Ste. 1120 Miami, FL 33131-1605 (Per Proof of Claim No. 4)</p> <p>Condor Capital Corp. 165 Oser Ave. Hauppauge, NY 11788 (Per Proof of Claim Nos. 5 & 6)</p> <p>Joseph & Michelle Campbell 162 E. Bergey Street Wadsworth, Ohio 44281</p>	<p>Wells Fargo Bank, N.A. P.O. Box 10438 Des Moines, IA 50306-0438 (Per Proof of Claim No. 1)</p> <p>Westlake Financial Services, Inc. 4751 Wilshire Blvd., Ste. 100 Los Angeles, CA 90010 (Per Proof of Claim No. 3)</p>
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/s/ Donald Luke Ross
Donald Luke Ross 0085914